

1 Deirdre Des Jardins  
2 145 Beel Dr  
3 Santa Cruz, California 95060  
4 Telephone: (831) 423-6857  
5 Cell phone: (831) 566-6320  
6 Email: [ddj@cah2oresearch.com](mailto:ddj@cah2oresearch.com)

7 Principal, California Water Research

8  
9 **BEFORE THE**  
10 **CALIFORNIA STATE WATER RESOURCES CONTROL BOARD**  
11

12 HEARING REGARDING PETITION FILED  
13 BY THE DEPARTMENT OF WATER  
14 RESOURCES AND U.S. BUREAU OF  
15 RECLAMATION REQUESTING CHANGES  
16 IN WATER RIGHTS FOR THE  
17 CALIFORNIA WATERFIX PROJECT

18 RESPONSE TO DWR OBJECTIONS TO  
19 PART 2 CROSS-EXAM EXHIBITS

20 Deirdre Des Jardins, principal at California Water Research, (“California Water  
21 Research”), hereby provides this response to objection by the California Department of Water  
22 Resources (“DWR”) to exhibits introduced in cross-examination by California Water Research.

23 DWR objects to exhibit DDJ-286, which is a simple graphical illustration of the timeline  
24 of the Oroville spillway incident. The graphical illustration was introduced as a visual aid to  
25 cross-examination of Nicky Suard on the flooding that occurred at Snug Harbor Resorts during  
26 the spillway incident. The graphical illustration is not intended to stand on its own, but to be  
27 referenced by Ms. Suard’s testimony on the events at Snug Harbor, and their correlation with the  
28 Oroville spillway incident. The graphical illustration is similar to exhibits that are used in civil  
29 trials with witness’s testimony.

30 Finally, in weighing the public interest in approving the enormous WaterFix project, the  
31 Board can and should consider public safety issues in the project design, and whether they have

1 been properly addressed by the project proponents. For these purposes, exhibit DDJ-286 is an  
2 appropriate and necessary adjunct to Ms. Suard's cross-examination testimony.

3 Dated May 4, 2018

Respectfully submitted,

4  
5 A handwritten signature in black ink, appearing to read 'D. Des Jardins', with a stylized flourish at the end.

6  
7 Deirdre Des Jardins  
8 Principal, California Water Research  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**STATEMENT OF SERVICE**

**CALIFORNIA WATERFIX PETITION HEARING  
Department of Water Resources and U.S. Bureau of Reclamation  
(Petitioners)**

I hereby certify that I have this day submitted to the State Water Resources Control Board and caused a true and correct copy of the following document(s):

**Response to DWR's Objections to Part 2 cross-exam exhibits**

to be served by Electronic Mail (email) upon the parties listed in the Current Service List for the California Water Fix Petition Hearing, dated March 26, 2018, posted by the State Water Resources Control Board at

[http://www.waterboards.ca.gov/waterrights/water\\_issues/programs/bay\\_delta/california\\_waterfix/service\\_list.shtml](http://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/california_waterfix/service_list.shtml)

*Note: In the event that any emails to any parties on the Current Service List are undeliverable, you must attempt to effectuate service using another method of service, if necessary, and submit another statement of service that describes any changes to the date and method of service for those parties.*

I certify that the foregoing is true and correct and that this document was executed on May 4, 2018.

Signature:



Name: Deirdre Des Jardins

Title: Principal, California Water Research

Party/Affiliation:

Deirdre Des Jardins

Address:

145 Beel Dr

Santa Cruz, California 95060